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34 **UNITED STATES DISTRICT COURT**
35 **NORTHERN DISTRICT OF CALIFORNIA**

36 UNITED STATES OF AMERICA,

37 Case No. 25-CR-0003-YGR (KAW)

38 v. Plaintiff,

39 **STIPULATION TO MODIFY**
40 **CONDITIONS OF RELEASE**

41 SHENG THAO,

42 and

43 Defendant.

44 **[PROPOSED] ORDER**

1 Defendant Sheng Thao and the United States, by and through their counsel of record,
 2 hereby stipulate as follows

3 1. Sheng Thao made her initial appearance before the Court on January 17, 2025.
 4 The Court entered an order setting a personal-recognition appearance bond in the amount of
 5 \$50,000 and set conditions of release (including, in relevant part, a no-travel location
 6 restriction outside of the Northern and Eastern Districts of California). *See* DE-14.

7 2. The parties agree on the following conditions-of-release modification: Ms.
 8 Thao will be permitted to travel to the Southern District of California during the period of
 9 September 20-22, to attend the Hmong 50th Anniversary Celebration event. Ms. Thao was
 10 recently contacted by an organizer of this event and asked to attend.

11 3. Pretrial Services Officer Reanna Agah has no objection to the stipulated
 12 location/travel modification of Ms. Thao's conditions of release.

13 IT IS SO STIPULATED.

15 Dated: September 17, 2025

DLA PIPER LLP (US)

16 By: /s/Jeffrey E. Tsai
 17 JEFFREY E. TSAI
 18 DARRYL L. TARVER

19 *Attorneys for Defendant*
 20 *SHENG THAO*

21 Dated: September 17, 2025

UNITED STATES OF AMERICA

22 By: /s/Abraham Fine
 23 ABRAHAM FINE
 24 MOLLY K. PRIEDEMAN
 25 LLOYD FARNHAM

26 *Assistant United States Attorneys*

[PROPOSED] ORDER

Pursuant to the stipulation of the parties, Defendant Sheng Thao's conditions of release are modified as follows:

Ms. Thao is permitted to travel to/from the Southern District of California during the period of September 20-22, 2025, in order for Ms. Thao to attend the Hmong 50th Anniversary Celebration event.

IT IS SO ORDERED.

Dated:

THE HON. KANDIS A. WESTMORE
UNITED STATES MAGISTRATE JUDGE